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*Attorneys for Plaintiffs Soundview Elite LTD.,
and Vanquish Fund Ltd.*

-----	x:	UNITED STATES DISTRICT COURT
	:	SOUTHERN DISTRICT OF NEW YORK
	:	
	:	
SOUNDVIEW ELITE LTD., and	:	
VANQUISH FUND LTD.,	:	
	:	
Plaintiffs,	:	Civil Action No. 13 cv 06895 (AT)
	:	
-against-	:	DECLARATION OF
	:	ETHAN KRASNOO, ESQ.
GERTI MUHO and LEVERAGED	:	
HAWK, INC.	:	
	:	
Defendants.	:	
-----	x	

I, ETHAN KRASNOO, ESQ. hereby declare:

1. I am an attorney with the firm of Patterson Belknap Webb & Tyler LLP ("Patterson Belknap"). I submit this Declaration in support of Plaintiffs' application for emergent relief, and I have personal knowledge of the facts set forth herein.
2. In a separate lawsuit currently pending in the United States District Court for the District of New Jersey, Patterson Belknap represents the Richcourt Funds, a group of private investment funds which include Plaintiffs Soundview Elite Ltd. ("Soundview") and Vanquish Fund Ltd. ("Vanquish Fund"). That action is filed under Civil Action No. 1:13-CV-04810.

3. In connection with that action, a subpoena was issued to Citibank, N.A. (“Citibank”) to produce, among other things:
 - a. all documents showing deposits made into any Citibank account held by Gerti Muho (“Muho”);
 - b. all documents showing deposits made into any Citibank account held by Leveraged Hawk, Inc. (“Leveraged Hawk”); and
 - c. all documents referring or relating to transfers of funds by Citibank from any account held by Leveraged Hawk.

4. Patterson Belknap received records in response to that subpoena on October 15, 2013. (True and correct copies of the records received from Citibank on October 15, 2013 are attached to this Declaration as **EXHIBIT A**).

5. Those records indicate that on August 8, 2013, \$2,067,307.24 was deposited into the CitiBusiness Streamlined Checking account of Leveraged Hawk, Inc. Prior to that deposit, Leveraged Hawk’s account had a balance of zero.


6. The records further indicate that on the following day, August 9, 2013, \$100,000 was withdrawn from that account and deposited into Muho’s personal checking account at a Citibank branch located at 1 Broadway, New York, New York. The records further indicate that prior to that transfer, Muho’s personal account had a balance of \$375.28.

7. The subpoenaed records show that by August 20, 2013 the balance of Muho’s personal account was reduced to \$41,067.09. By September 2, 2013 the balance of Leveraged Hawk’s CitiBusiness account was reduced to \$1,659,754.39.

8. In light of these facts, Plaintiffs in this action are deeply concerned that the \$2,067,307.24 transferred from the HSBC account of Soundview Elite to Leveraged Hawk on

August 8, 2013 by unauthorized transfer is being rapidly dissipated by Muho and any judgment they may recover against Defendants will be frustrated.

Dated: October 15, 2013


Ethan Krasnoo, Esq.